

### REMARKS

In the outstanding Official Action, claims 1 and 2 have been rejected as being unpatentable over FENG in view of NAHABOO et al. in further view of SZLAM et al. Claims 3, 4, 6, 7, 9, 11, 12, 14, 15, and 17 were rejected under 35 U.S.C. § 103(a) as being unpatentable over FENG in view of NAHABOO et al. Claims 5, 8, 10, 13, 16, and 18 were rejected under 35 U.S.C. § 103(a) as being unpatentable over FENG in view of NAHABOO et al. in further view of ABELOW. Applicants respectfully traverse.

Claim 1 recites applying models to interface design, interactive interface testing, and interface system deployment. Of course, designing and testing interfaces is well known. However, applying models to such processes is believed to be novel. Pages 14 and 15 of the specification provide examples of applying models to interface design.

Moreover, it is submitted that merely selecting from *pre-set* browser interface models (as taught by FENG) is patentably distinguishable from *designing* an interface, as claimed. In other words, selecting something already designed (i.e., pre-set) is different from actually designing. It is believed that FENG does not teach designing a user interface, but rather teaches selecting pre-set models. Nor does the Examiner appear to even assert that FENG teaches interface design. Nevertheless, it is not simply designing an interface that is novel, but rather, applying the models to interface design. Therefore, because FENG does not teach interface design, and both FENG and NAHABOO et al. do not teach applying models to interface design, it is requested that the Examiner indicate the allowability of claim 1.

Similarly, applying models to interactive interface testing is believed to be patentably distinguishable from simply testing, as disclosed by NAHABOO et al. FENG does not contemplate testing, and NAHABOO et al. do not contemplate

incorporating models. Thus, the proposed combination does not teach or suggest applying models to interactive interface testing.

Claim 1 is limited to interfaces for customer service representatives. In contrast, FENG pertains to creating browsers for browsing the Internet and multimedia applications. Although SZLAM et al. discuss customer agents, SZLAM is not directed to designing a user interface or even user interfaces for that matter. Thus, applicants submit that one of ordinary skill in the art would have no reason to consult the SZLAM disclosure and therefore the Examiner's proposed combination of the references is improper. For this additional reason it is respectfully requested that the Examiner withdraw the rejections of claim 1.

Applicants further submit that each of independent claims 3 and 11 recite validating targeted user behaviors and user preferences of the model. The portion of FENG that the Examiner relies upon to show the claimed validating does not describe any type of validating. In fact, FENG is not concerned with the actual creation of the model, much less validation. Validating the model helps to determine whether the initial grouping is still accurate. Thus, for at least this additional reason, it is requested that the Examiner withdraw the rejections of claims 3 and 11.

With respect to "tracking design requirements for the validated user behaviors and user preferences," applicants again note that FENG is not concerned with the actual interface design process. There is no disclosure or suggestion of interface design requirements. There is no disclosure or suggestion of design requirements based upon user behaviors, or for that matter, validated user behaviors. There is no disclosure or suggestion of design requirements based upon user preferences.

Claim 11 further recites "validating pre-determined targeted behaviors and preferences of the model." No such feature is taught by any of the applied

references. The claimed “integrating user-customization into a design by creating a user-profile in which the users select various navigation preferences and information display choices that can be applied throughout the interface” is a very specific limitation. The general teachings of NAHABOO do not pertain to user profiles in which users select preferences and choices. The user profile of FENG is not used in an interface design, as discussed above. Moreover, FENG’s user profile lacks the claimed navigation preferences and information display choices.

Accordingly, for all the reasons noted above, applicants respectfully request reconsideration and withdrawal of each of the outstanding rejections of claims 1, 3 and 11. Applicants additionally submit that each of claims 2, 4 - 10, and 12 - 18 are allowable, at least because each depends, directly or indirectly, from an allowable independent claim, as well as for reasons related to their own recitations.

SUMMARY AND CONCLUSION

Applicants believe that the present application is in condition for allowance, and respectfully request an indication to that effect. Applicants have discussed the features recited in applicants' claims and have shown how these features are not taught, disclosed, nor rendered obvious by the reference applied by the Examiner.

Should the Examiner have any questions, please contact the undersigned at the telephone number provided below.

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Respectfully submitted,  
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